



COUNTY OF LAKE PUBLIC WORKS DEPARTMENT

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G. R. Shaul
Public Works Director

June 6, 2006

Mr. Robert Schneider, Chair
Central Valley Regional Water Quality Control Board
11020 Sun Center Drive, #200
Rancho Cordova, CA 95670

SUBJECT: Clear Lake Nutrient TMDL

Dear Mr. Schneider,

This letter is in response to the proposed amendment to the Water Quality Control Plan for the Sacramento River and San Joaquin River Basins for the Control of Nutrients in Clear Lake. This letter supplements our letter of June 6, 2006.

The County disagrees with the Target Report prepared by Tetrattech. The Target Report recommends that chlorophyll-a be utilized in determining whether Clear Lake is in compliance. There is very little historical data on chlorophyll-a levels in Clear Lake, therefore, the model is unverifiable. The modeled chlorophyll-a levels do not reflect the changes in secchi depth as noted at the May Board workshop, see Attachment 1. The main assumption behind the TMDL is that phosphorus levels in the lake cause increased blue-green algal blooms. Data collected by the Department of Water Resources does not support this assumption, see Attachment 2. Measured lake phosphorus levels do not reliably predict the chlorophyll-a levels (26% correlation), based on data collected by DWR in 2005-2006 for the Regional Board, see Attachment 3.

Regional Board staff has listened to the County's arguments and has worked with us in revising the proposed Basin Plan language to provide the flexibility in implementing the TMDL. Staff has recognized that phosphorus levels are not the only issue and there are limitations to the lake model utilized by TetraTech. In response to the revised language as provided to the County on May 25, 2006, we offer the following:

- The County recognizes that control of phosphorus and sediment is likely to have beneficial impacts on water quality and will continue to work to reduce the phosphorus loading to Clear Lake, however, we would like to be on record as objecting to the numerical loadings proposed.
- We appreciate the revised language that establishes a working group to reevaluate the conditions on Clear Lake to refine the TMDL by conducting additional studies, reevaluation of the monitoring plan and development of impairment criteria. The County recognizes that this is an expensive process and the required additional studies and monitoring are not funded.

Mr. Robert Schneider, Chair, CVRWQCB
Clear Lake Nutrient TMDL
June 6, 2006
Page 2

The County does not support issuance of the Nutrient TMDL for Clear Lake with numeric waste load allocations, however, with the flexibility inserted in the Basin Plan language to allow further studies, the County does not object to the proposed Basin Plan language.

The County will continue to work with staff on alternative language for the Proposed Basin Plan amendment.

If you have any questions, please call me at (707)263-2341.

Sincerely,

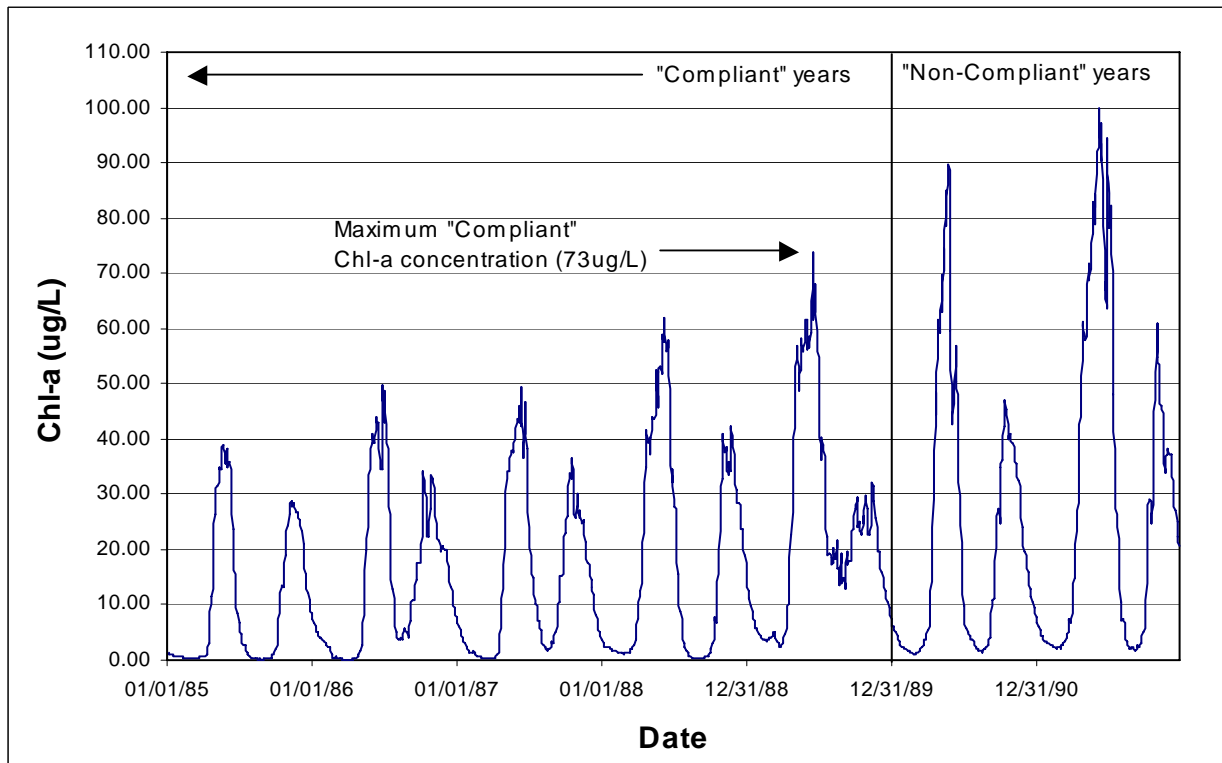
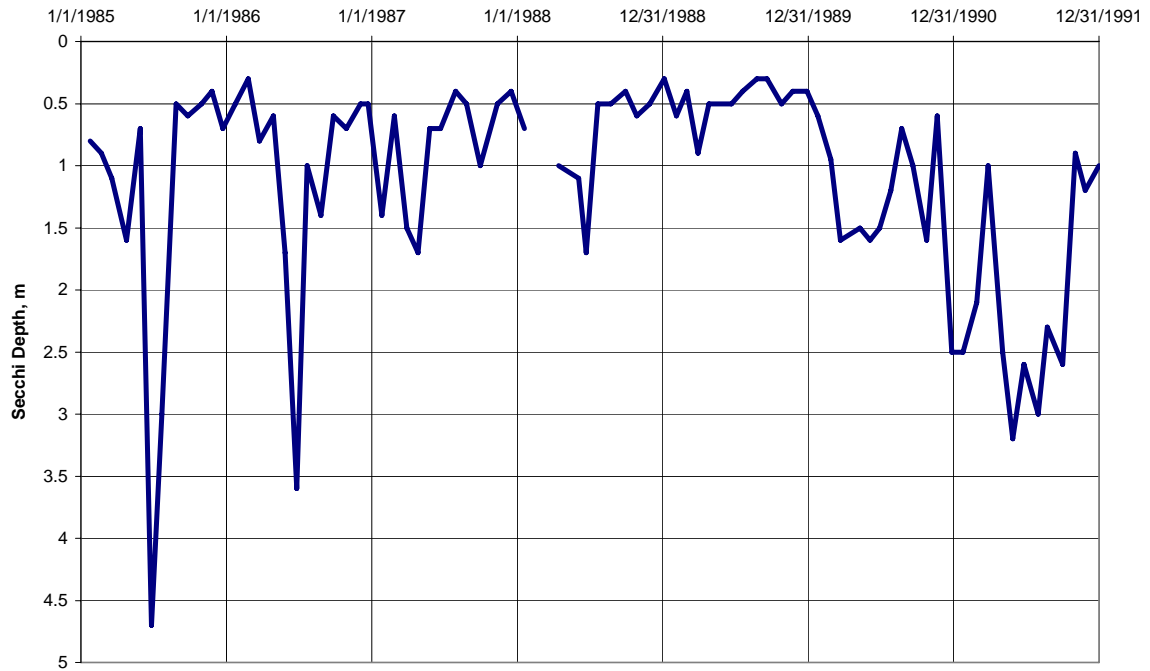
Robert L. A. Lossius
Assistant Director

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Enclosures

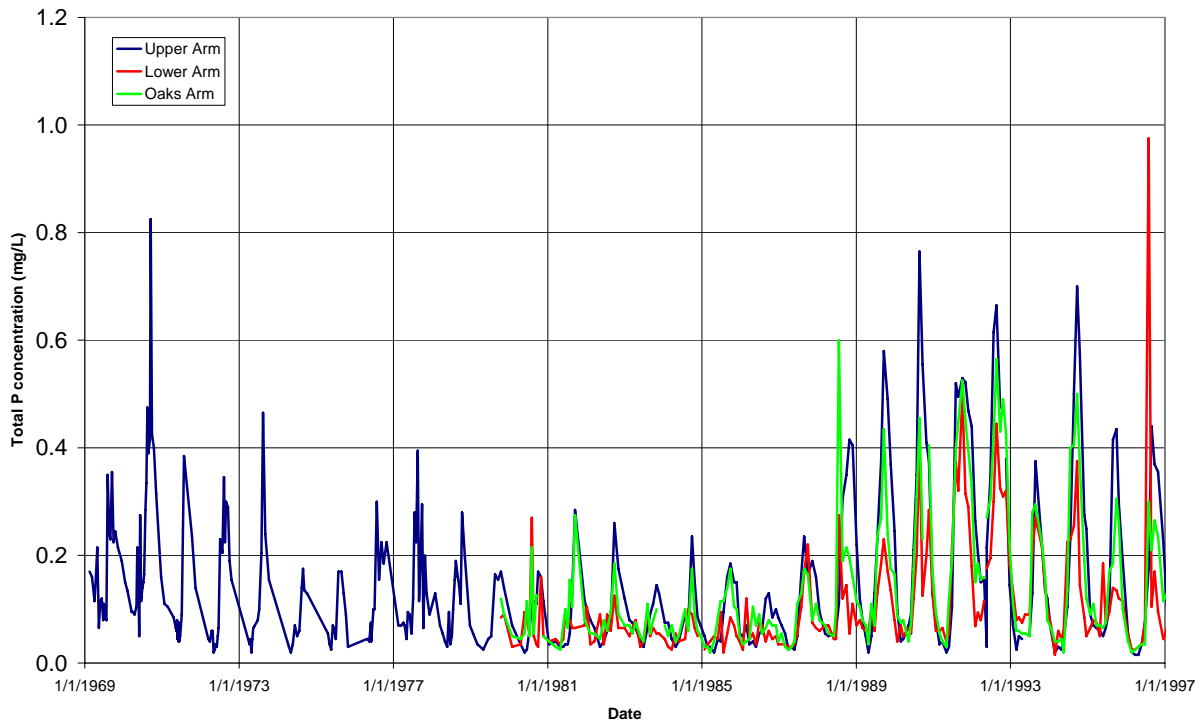
cc: Lake County Board of Supervisors

CLEAR LAKE UPPER ARM SECCHI DEPTH
Source: Department of Water Resources

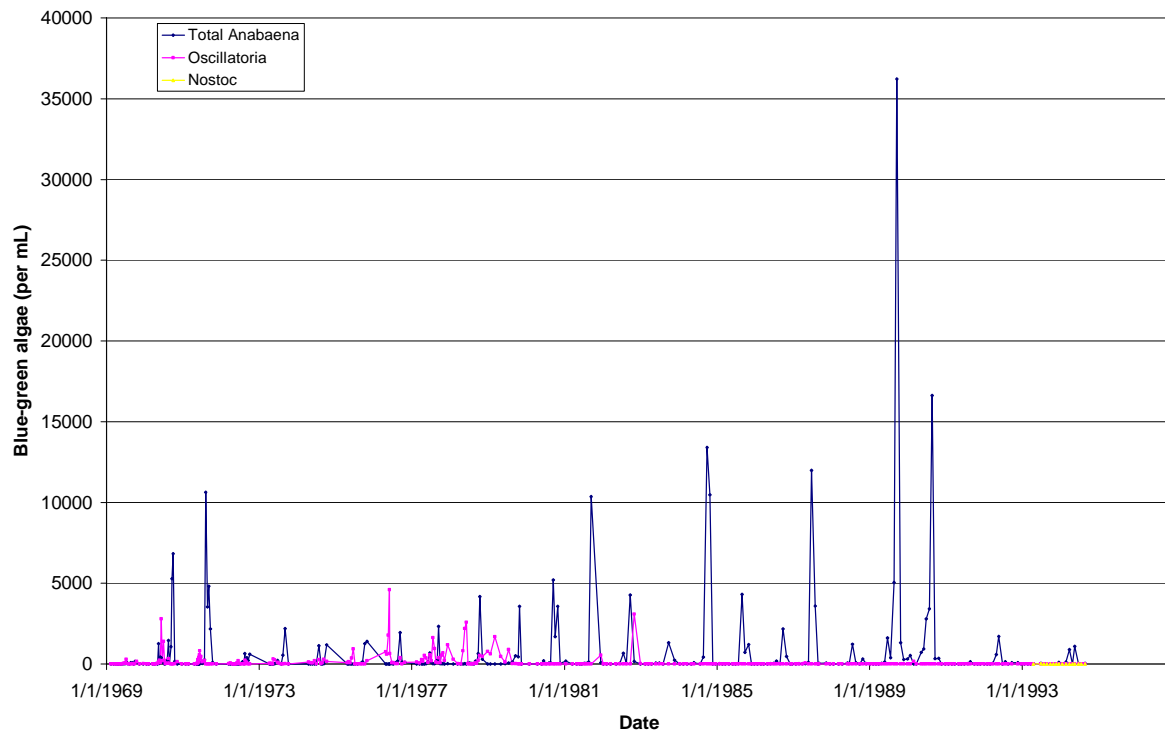


Attachment 1: Comparison of Upper Arm Secchi Depths collected by the California Department of Water Resources with the modeled Chlorophyll-a concentrations calculated by TetraTech

Concentration of total phosphorus in water column, Clear Lake, 1969-1997



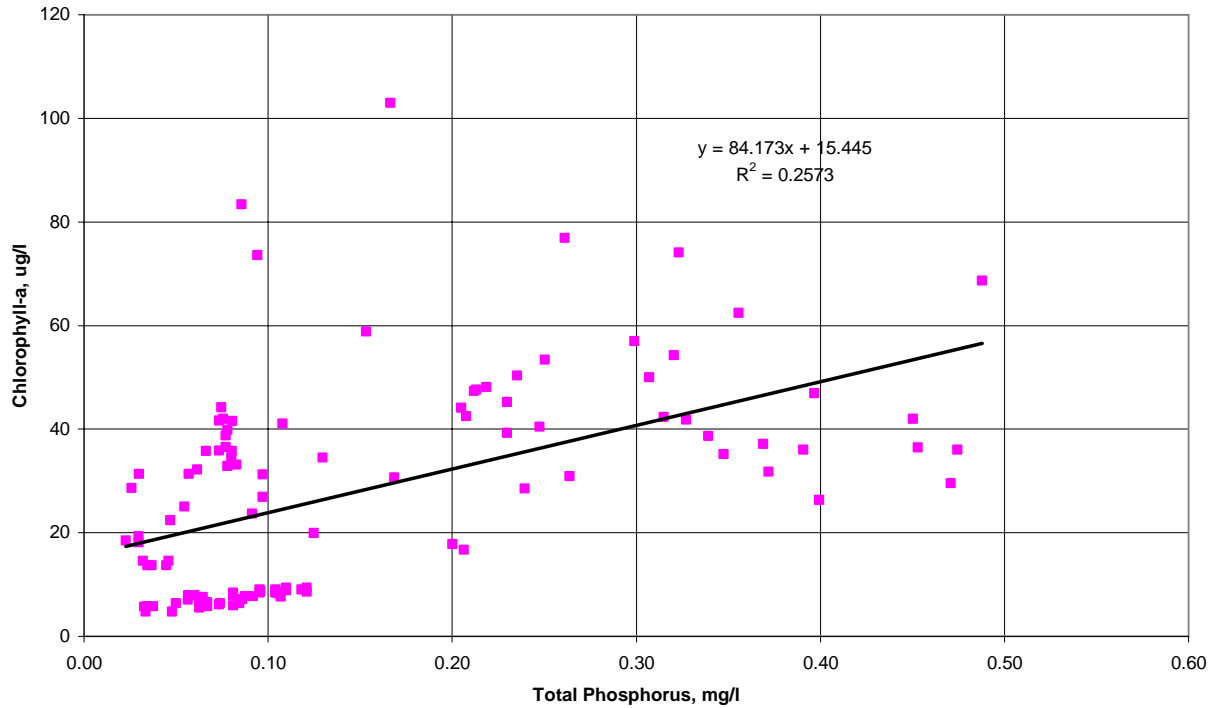
Blue-green algae, Clear Lake - Upper Arm, 1969-1994



Attachment 2: Comparison of phosphorus concentrations and blue-green algae cell counts collected by the California Department of Water Resources

CLEAR LAKE PHOSPHORUS RELATIONSHIPS

Source: Central Valley Regional Water Quality Control Board



Attachment 3: Relationship of measured total phosphorus and measured chlorophyll-a concentrations in Clear Lake 2005-2006